

Before the
FEDERAL TRADE COMMISSION
Washington, D.C. 20554

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In the Matter of

Federal Communications Commission
Office of Secretary

The North American Numbering Council's (NANC)
Recommendations on the North American Numbering
Plan Administrator, Billing and Collection Agent,
And Related Rules

CC Docket No. 92-237

COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY, PACIFIC BELL
AND NEVADA BELL ON THE NORTH AMERICAN NUMBERING COUNCIL'S
RECOMMENDATION REGARDING NORTH AMERICAN NUMBERING PLAN
ADMINISTRATOR AND BILLING AND COLLECTION AGENT

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SUMMARY*

The Commission must choose Mitretek as the new NANPA. The Commission can not interpret the split vote of 13 to 11 at the NANC meeting as anything more than a narrowing of the choices from four original candidates to two remaining candidates. The NANP Working Group, the most informed and knowledgeable body, preferred Mitretek to Lockheed. The Commission must consider the Comments received in this proceeding and make its own determination as to whether Lockheed or Mitretek can best perform the duties of the new NANPA. Mitretek must be chosen because they are the only entity properly staffed to do the job.

* All abbreviations used herein are referenced within the text.

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And Related Rules)	

**COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY,
PACIFIC BELL AND NEVADA BELL ON THE NORTH AMERICAN NUMBERING
COUNCIL'S RECOMMENDATION REGARDING NORTH AMERICAN NUMBERING
PLAN ADMINISTRATOR AND BILLING AND COLLECTION AGENT**

Southwestern Bell Telephone Company (SWBT), Pacific Bell (Pacific) and Nevada Bell (Nevada) hereby submit these Comments on the Recommendation of the North American Numbering Council (NANC) regarding the North American Numbering Plan Administrator (NANPA) and Billing and Collection Agent. For the reasons set forth herein, SWBT, Pacific and Nevada submit that the Commission must choose Mitretek Systems (Mitretek) as the NANPA. The new NANPA will assume an essential role and will be responsible not only for the duties of the present NANPA, but also, the additional duties of central office (CO) code administration and NPA relief planning. It is critical that these functions are performed correctly and efficiently. Mitretek is the only bidder properly staffed to handle these complex tasks in a quality manner.

I. INTRODUCTION AND BACKGROUND

In July, 1995, the Commission released its Number Administration Order¹. The Number Administration Order established the NANC, which was directed to make a recommendation to the Commission on a neutral entity to serve as the NANPA and an appropriate mechanism for recovering the costs of number administration in the United States.

The new NANPA will fulfill all the duties of the present NANPA. The new NANPA will also assume additional duties. The additional duties include CO code administration and NPA relief planning for the NPAs located throughout the United States. These additional duties are currently being handled by approximately twelve companies in the United States which consist of eleven incumbent local exchange carriers (LECs) across the country and Bellcore. Thus, the new NANPA will have an extremely complex and important job and will be essential in ensuring the proper administration of vital numbering resources.

The opening for the position of the new NANPA was advertised to the public. All interested parties had the opportunity to submit written bids for the job. The bidding process required candidates to submit a firm, fixed price; thus, candidates had to anticipate all expenses for a five year period and bid accordingly. Four bids were received.

¹Report and Order, CC Docket No. 92-237, released July 13, 1995 (the Number Administration Order)

A. **The NANP Working Group, the Most Informed and Knowledgeable Body, Preferred Mitretek to Lockheed.**

To fulfill its charge to evaluate the candidates and make a recommendation for the new NANPA, the NANC formed a working group called the NANP Working Group. The NANP Working Group developed a Requirements Document and an evaluation process to assess the candidates. The NANC approved a subset of the NANP Working Group, the NANP Evaluation Team, to assist in the selection of the new NANPA. The NANP Evaluation Team included numbering subject matter experts (SMEs) throughout the NANP serving area. These individuals were very familiar with the job functions performed by the current NANPA and the CO code administrators. The members of the NANP Evaluation Team spent several weeks carefully reviewing and analyzing the bids of each of the four entities vying to be the new NANPA. The NANP Evaluation Team became even more familiar with each job function to be performed by the new NANPA as well as the specific details contained in the proposals from each of the four bidders. After a thorough review of each written proposal, the NANP Evaluation Team developed additional questions to each vendor for written response and also conducted face-to-face interviews with each bidder to gain a more thorough understanding of each of the proposals². In total, the NANP Working Group spent in excess of 19 days painstakingly reviewing every element of each of the four proposals. The members of the NANP Evaluation Team are clearly the most informed and knowledgeable group of people as to what the job of the new NANPA will entail and which entity is most competent to handle the task.

²See, NANC Recommendation, Page 7, Section 3.2, May 15, 1997 (hereinafter NANC Recommendation). It should be noted that because Lockheed is not adequately staffed, it relied heavily on a consultant to respond to the questions during the interview.

Following its complete review of each proposal, the NANP Evaluation Team narrowed the choices to Lockheed Martin Corporation (Lockheed) and Mitretek. In the final vote, the NANP Evaluation Team, acting as the NANP Working Group, recommended Mitretek as the new NANPA. The NANP Working Group passed this recommendation to the NANC.

Members of the NANC then convened for a one day meeting to discuss the recommendation from the NANP Working Group. Unlike the NANP Working Group who spent weeks reviewing every detail of the proposals and personally interviewing the candidates, the NANC spent only a few hours reviewing the work done by the NANP Working Group. The Mitretek proposal was approximately \$22.5 million more than the Lockheed proposal over the five year life of the agreement. Based on this price differential, some NANC members believed Lockheed should get the contract despite the recommendation from the NANP Working Group. The final result was a split decision with 13 of NANC's 32 voting members recommending Lockheed and 11 supporting Mitretek.

B. The Split Decision Vote Cannot be Construed As a Recommendation for Lockheed.

The Commission can not interpret the result obtained at the NANC as anything more than a narrowing of the choices from four original candidates to two remaining candidates: Lockheed and Mitretek. Clearly no consensus has been reached. The widely accepted definition of "consensus" in the industry is " . . . more than a simple majority, but not necessarily unanimity . . .". An outcome of 13 to 11 is ONLY a simple majority at best, and is most certainly NOT consensus. This issue is especially significant given that the NANP Evaluation

Team of the NANP Working Group, the entity charged with the responsibility for reviewing the volumes of underlying detail presented with each of the bids and personally interviewing the candidates, preferred Mitretek over Lockheed. Thus, the Commission must carefully review all Comments received in this proceeding and make its own determination as to whether Lockheed or Mitretek can best perform the duties of the new NANPA.

C. Proper Performance by the NANPA is Vital to the Entire Industry

Accurate and timely performance by the new NANPA is vital to ensuring appropriate administration of scarce numbering resources in a timely manner. If these scarce numbering resources are not properly administered, the entire industry will face serious and irrevocable harm. Mismanagement of NANP resources could result in one of two negative outcomes: 1) an inadequate supply of numbering resources for service providers to provide to their customers, or 2) premature exhaust of the 10-digit NANP. Inadequate staffing of the new NANPA could result in the very real possibility that service providers could not get the resources they needed in a timely fashion to provide services. It could mean that NPA relief planning is not done in a timely or accurate fashion resulting in unavailability of resources. Unavailability of resources prohibits customers from establishing telephone service for establishing businesses or personal use. This results in held orders and irate customers. On the other hand, inadequate staffing could result in an administration that could distribute resources without adequate discretion resulting in unnecessary NPA relief implementation plans and premature exhaust of the 10-digit NANP.

D. Mitretek Must be Chosen as the New NANPA because they are the Only Entity Properly Staffed to Do the Job.

The new NANPA will assume the duties of the present NANPA as well as two additional critical functions: (i) CO code administration; and (ii) NPA relief planning. The present NANPA uses approximately five full time employees to perform its duties. The two additional functions of CO code administration and NPA relief planning are handled by approximately twelve different companies acting as administrators across the country. These administrators employ approximately 50-60 experienced personnel to handle these two additional functions. Thus, currently, approximately 60-65 experienced personnel are handling the duties that will be assumed by the new NANPA. The FCC staff also had estimated staffing requirements between 40 and 50 personnel in its Number Administration Order.³

In its bid, Mitretek proposes to handle NPA Relief Planning and CO Code administration functions with 41 people⁴. The NANC Recommendation expressly found that Mitretek's suggested levels of staffing should be sufficient to assure that the CO Code administration and NPA relief planning demands of the industry, including new entrants, will be met.⁵ Lockheed plans to perform these same functions with only 17 people⁶, less than half the amount of staff proposed by Mitretek and over two thirds less than the amount of staff performing the job today.

³See Number Administration Order, para. 94.

⁴This staffing level was set after Mitretek performed a detailed analysis to determine the level of staffing required for the job. NANC Recommendation, Page 10.

⁵Id.

⁶The NANC Recommendation specifically notes the concerns regarding the ability of Lockheed to perform the NPA relief and CO code administration functions in an efficient and effective manner with their proposed small staff (i.e., 11 people). NANC Recommendation, Page 6.

These staffing differences account for Mitretek's higher price over the five year life of the agreement. As a matter of fact, when per capita costs are examined for Mitretek and Lockheed, they are almost identical.

Not only is Lockheed wholly understaffed to properly perform the job, but also, Lockheed's proposal does not indicate that they have secured an experienced team⁷. The NANPA functions are complex and require the staff to have an intimate knowledge of numbering issues, CO administration and NPA relief planning as well as familiarity with the Commission, the various state entities and the history and background of the relevant proceedings. Nevertheless, the proposed Lockheed team has no employees who are familiar with these duties. In addition, Lockheed has NOT taken a consistent interest in numbering issues and/or matters of numbering policy. For example, Lockheed almost never attends industry meetings related to numbering, with the notable exceptions of 800/888 service and number portability. Mitretek, on the other hand, has taken an active interest in industry forums related to numbering administration and policy. Moreover, Lockheed appears to rely extensively on mechanized systems and processes in lieu of personnel. Therefore, Lockheed will not have adequate staff to deal with issues requiring human intervention and judgment.⁸ Obviously, it would be impossible for a team less than two thirds in size and with no relevant experience to competently perform a task currently performed by 60-65 experienced personnel.

⁷Id. at Page 7. The NANC Recommendation expressly recognized the concern that Lockheed would not have "appropriate experienced staff in place to meet the required NANPA transition time frames".

⁸Id. at page 7.

Mitretek, on the other hand, realizes that proper performance of the job requires the retention of experienced numbering experts. Mitretek has already hired such experts. In fact, these experts helped prepare Mitretek's proposal and participated in the interview process.⁹ Obviously, experienced employees command a higher price than individuals with no experience; however, the higher price in this instance is essential and warranted for adequate performance of the job.

Moreover, Mitretek proposes to locate its team at five different locations throughout the country, enabling it to properly position itself in the local markets. Conversely, Lockheed, presumably to save on the costs of operating and maintaining a number of different offices, plans to locate its entire team in Tarrytown, New York. The NANC Recommendation expressly recognizes the concern that Lockheed will be unable to attract and retain experienced personnel to perform the NPA relief and CO code functions because of its centralization.¹⁰ Moreover, Lockheed will not possess essential local expertise in the key regions.¹¹ Proper performance of the job, especially in the area of NPA relief planning, requires qualified experts with local expertise. Lockheed simply cannot command critical local presence by centralizing its operations in one location.

The new NANPA cannot adequately perform the job without proper staffing. Because of the requirements for firm, fixed pricing, the selected entity must perform at the bid price. The price may be adjusted upward if the actual number of CO code assignments made per year, the

⁹ Id. at page 10.

¹⁰ Id. at page 6.

¹¹ Id.

number of numbering plan area codes (NPAs) requiring relief per year, or, the number of NPA relief meetings per NPA requiring relief exceed 120% of NANPA's assumptions for the above tasks. Thus, if Lockheed is selected as the new NANPA, they are not permitted to request additional funding from the NANC unless the assumptions are faulty. Therefore, service quality problems appear inevitable. Mitretek requests that if the work required is less than 80% of the stated assumptions for those tasks, it be allowed to adjust the price downward by 20%. Thus, the price differential between Lockheed and Mitretek may ultimately be less than anticipated.

In summary, the staffing issues alone demand that Mitretek be awarded the NANPA contract. Lockheed proposes to perform the job with an inappropriately staffed team lacking in relevant experience and all located in one office at one end of the country. Mitretek recognizes that proper performance of the job requires a significantly larger staff, with the relevant experience, located in key areas throughout the country.

E. The Industry Recently Evaluated Lockheed's Performance as the Help Desk Administrator and Found them Inadequate.

Lockheed is the current provider of services involving the 800/SMS Help Desk. In the year prior to the expiration of Lockheed's current contract, the job for the 800/SMS Help Desk provider was submitted to the formal public bidding process. Pursuant to that process, Lockheed, as well as other interested entities had the opportunity to bid for the job. As the incumbent provider, Lockheed certainly enjoyed an advantage in that process.

The SMS/800 Management Team (SMT) engaged a consultant to administer a Request for Proposal (RFP) process to select the new provider. The consultant formed a special team to carefully evaluate all the bids received. After an extensive analysis of all the bids, the consultant

recommended that Sykes Enterprises, Inc. (SEi) be selected. The SMT accepted the consultant's recommendation and contract negotiations are underway to manage the transition of SMS/800 Help Desk functions from Lockheed to SEi. Thus, the first time the industry had an opportunity to evaluate the performance of Lockheed in connection with its performance of numbering administration duties, the industry indicated that Lockheed would not be retained in this role. The Commission cannot risk choosing Lockheed for the critical role as the new NANPA given its questionable track record in handling its duties as the 800/SMS Help Desk provider.

The NANC Recommendation identifies four advantages of Lockheed over Mitretek: (1) price; (2) Lockheed has experience with numbering issues relative to LNP NPAC and the 800/888 Help Desk; (3) because of Lockheed's job as 800/SMS Help Desk provider, there is the potential to achieve synergy associated with the further consolidation of numbering administration systems and/or processes; and (4) Lockheed's proposed state-of-the-art administration systems.¹² Obviously, since Lockheed's contract as the 800/SMS Help Desk provider was terminated early with one of the reasons cited as lacking state-of-the-art systems, the benefits stated may not be benefits at all. Also, since it will no longer serve in that capacity, any potential benefits of synergy will not be realized. Thus, the only benefit of Lockheed over Mitretek is price and on a per capita basis, they are virtually the same. Therefore, the main issue concerning selection of the new NANPA becomes one of adequate staffing to perform the job effectively. Because Lockheed will be unable to competently perform the job at the the staffing levels submitted, the only choice for the new NANPA must be Mitretek.

¹²Id. At Page 5.

II. CONCLUSION

For all the foregoing reasons, SWBT, Pacific and Nevada respectfully request that the Commission designate Mitretek as the new NANPA.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Katie M. Turner, hereby certify that the foregoing, "COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY, PACIFIC BELL AND NEVADA BELL ON THE NORTH AMERICAN NUMBERING COUNCIL'S RECOMMENDATION REGARDING NORTH AMERICAN NUMBERING PLAN ADMINISTRATOR AND BILLING AND COLLECTION AGENT" in Docket No. 92-237 has been filed this 20th day of June, 1997 to the Parties of Record.

A handwritten signature in cursive script that reads "Katie M. Turner". The signature is written in dark ink and is positioned above the printed name.

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